

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**TRI-CITIES HOLDINGS LLC, JANE DOE
NOS. 1-2, AND JOHN DOE NOS. 1-6,**

Plaintiffs,

v.

**TENNESSEE HEALTH SERVICES AND
DEVELOPMENT AGENCY; CITY OF
JOHNSON CITY, TENNESSEE; JOHNSON
CITY BOARD OF COMMISSIONERS; AND
JOHNSON CITY BOARD OF ZONING
APPEALS,**

Defendants.

**Civil Action No. 3:12-cv-00669
Judge Haynes**

**TENNESSEE HEALTH SERVICES AND DEVELOPMENT AGENCY’S
MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

The state defendant, Tennessee Health Services and Development Agency (“HSDA”), hereby respectfully requests that the Court grant it an additional twenty-one (21) days from August 5, 2013, the date its answer or response is presently due, to answer or otherwise respond to the Complaint. In support of this motion, the HSDA notes that this is its first request for an extension of time to answer, that the Complaint is more than 70 pages in length, that the HSDA requires additional time in which to investigate and respond to the Complaint, and that the Court has granted the other defendants in the lawsuit the additional twenty-one days in which to respond that is being requested by the HSDA herein (Doc. 25).

WHEREFORE, the HSDA respectfully requests that the Court grant it a 21-day extension

of time in which to answer or respond to the Complaint; *i.e.*, up through and including August 26, 2013.

Respectfully submitted,

ROBERT E. COOPER, JR.
Attorney General and Reporter

s/Sue A. Sheldon
SUE A. SHELDON (TN BPR # 015295)
Senior Counsel
SARA E. SEDGWICK (TN BPR # 004336)
Senior Counsel
Office of the Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202
(615) 741-2640

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on the following counsel of record through the Electronic Filing System on this 31st day of July, 2013:

Rick Piliponis, Esq.
116 Third Avenue, South
Nashville, Tennessee 37201

James A. Dunlap Jr., Esq.
James A. Dunlap Jr. & Assoc. LLC
801 West Conway Drive NW
Atlanta, Georgia 30327

K. Erickson Herrin
HERRIN, BOOZE & McPEAK
515 E. Unaka Avenue
Johnson City, Tennessee 37601

s/Sue A. Sheldon
SUE A. SHELDON